

NICOLAS V. VIETH

Bar Nos. ID 8166 / WA 34196

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Attorney for Defendant - Jese David Carillo Casillas

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
(The Honorable Edward F. Shea)**

UNITED STATES OF AMERICA,)	CASE NO. 4:15-CR-06049-EFS-2
)	
Plaintiff,)	UNOPPOSED MOTION
)	TO CONTINUE JURY TRIAL
vs.)	AND EXTEND DOCUMENT
)	DEADLINES
JESE DAVID CARILLO CASILLAS,)	
)	<i>With Oral Argument</i>
Defendant.)	Tuesday, March 06, 2018
)	at 9:00 a.m.

COMES NOW, the Defendant, Jese David Carillo Casillas, by and through his counsel of record, Nicolas V. Vieth of Vieth Law Offices, Chtd., and moves the Court to continue the Jury Trial currently scheduled for Monday, March 26, 2018 at 9:00 a.m., as well as extend all pretrial document due dates.

UNOPPOSED MOTION TO CONTINUE JURY TRIAL - 1

1 The United States Assistant Attorney, Stephanie VanMarter, has been
2 contacted and has no objection to the continuance of this matter.

3 The Defendant requests additional time based upon the following reasons:

- 4 1) The undersigned was recently appointed to this case on February 14,
5 2018, and will require additional time to review the record and
6 discovery, as well as meet with the client to discuss said discovery
7 and the ongoing investigation;
- 8 2) Defense counsel requires the use of a Spanish-English interpreter to
9 communicate with the Defendant;
- 10 3) The undersigned received a voluminous amount of discovery on
11 February 22, 2018, and will need further time to adequately review
12 said materials;
- 13 4) The undersigned has met with Mr. Casillas, who understands the
14 need for a continuance to ensure that counsel can become fully
15 informed and competently advise the Defendant as how to properly
16 proceed; and
- 17 5) In addition, defense counsel will be submitting a funding
18 authorization for the expert services of private investigator Tim
19

1 McCann, TJM Enterprises, to assist counsel with the investigation
2 regarding the pretrial phase of the Defendant's case.

3 Counsel has discussed this request for a continuance with the Defendant in
4 order to fully apprise him that he has the right to the "Speedy Trial Act." Mr.
5 Casillas agrees to this continuance and a signed statement of reasons will be
6 forthcoming.¹ Defendant suggests that any delay in this matter is justified and
7 that the interests stated herein outweigh the interest of the public and Defendant
8 in a speedy trial under 18 U.S.C. § 3161(h)(7)(A).

9 For these reasons, Defendant respectfully requests a continuance of six (6)
10 months for the Jury Trial. Counsel seeks another pretrial date to determine
11 substantive motions that have yet to be filed and a trial date that is amenable to
12 the Court and counsel, so that a Jury Trial date may be held at a date and time
13 convenient to both the Court and counsel.

14 DATED this 2nd day of March, 2018.

15 VIETH LAW OFFICES, CHTD.

16 /s/ Nicolas V. Vieth
17 NICOLAS V. VIETH
18 Attorney for Eric J. Perez

19 ¹ The undersigned has spoken with chambers and a Statement of Reasons will be
20 signed at the upcoming Pretrial Conference set for Tuesday, March 6, 2018,
following discussion of a potential new trial date.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of March, 2018, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system which sent a Notice of Electronic Filing to the following person(s):

USAWAE.CBaunsgardECF@usdoj.gov
USAWAE.SVanMarterECF@usdoj.gov

/s/ Nicolas V. Vieth
NICOLAS V. VIETH